

## UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

April 15, 2020

Antonio Pietri President and Chief Executive Officer Aspen Technology Inc. 20 Crosby Drive Bedford, MA 01730

> Re: Aspen Technology Inc. Form 10-K for Fiscal Year Ended June 30, 2019 Filed September 10, 2019 File No. 001-34630

Dear Mr. Pietri:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance Office of Technology